

LEWIS R. WEINER, MD  
Internal Medicine

ONE DAVOL SQUARE, SUITE 304  
PROVIDENCE, RI 02903  
(401) 369-7070 Phone  
(401) 369-7080 Fax

December 10, 2013

Randy Olen, Esq.  
478 A Broadway  
Providence, RI 02909

Dear Mr. Olen,

I am writing in follow up to your letter of December 9, on behalf of Joseph Caramadre, DOB 1/10/60, who I have followed for general medical care.

As has been outlined in extensive prior medical records and disability forms, Joseph has a past medical history including major depressive disorder, recurrent and severe generalized anxiety disorder, and has been followed for this for years. In addition, I have followed him for chronic musculoskeletal pain and back pain, kidney stones with secondary hematuria, cholelithiasis, fatty liver, chronic fatigue, sleep apnea for which he is on CPAP, a chronic ventral hernia, GERD, a history of asthma, vertigo, hypertension, symptoms of an enlarged prostate, chronic headaches, ear pain, and ADD.

His main disability has been related to accelerated depression, fatigue, difficulties with disabling anxiety, which has resulted in cognitive difficulties including memory, focus, concentration, motivation and stamina.

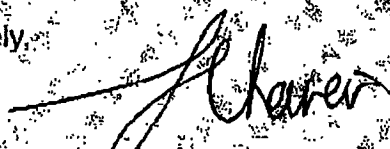
Based on this history, it is clear that the stress of his legal proceedings as well as the effect of future incarceration would have a significant deleterious effect on his general health, both physical and mental.

This has also been documented previously in notes per his psychiatrist, Dr. Xavier.

Please let me know if you have any questions or need any further information regarding his care or past history.

Thank you for your concern in managing his case.

Sincerely,



Lewis R. Weiner, M.D.

AFFIDAVIT

---

Sarah L. Xavier, D.O.

Psychiatrist

652 George Washington Hgwy  
Suite 400, Lincoln, RI

401.334.1830

2/21/2013

Re: Joseph Caramadre  
DOB: 1-10-60

Dear Interested Party,

I am Mr. Caramadre's treating psychiatrist. I have been treating Mr. Caramadre since 10/13/11. I was asked by Mr. Caramadre to document medical facts, as they relate to his mental health, leading up to and around the time of November and December 2012.

I am treating Mr. Caramadre for Major Depressive Disorder, Recurrent and Severe and Obsessive Compulsive Disorder. For these symptoms, which are profound and disabling, he is currently being treated on a four-drug medication regimen.

Based on the documents that I have collected from his previous psychiatrist, his mental health condition has been longstanding and his symptoms have been largely treatment refractory. Mr. Caramadre has been aggressive in attempting to pursue relief. He has undergone multiple medication trials dating back to 2001 and he has also undergone Transcranial Magnetic Stimulation, a procedure often employed for refractory and severe major depression. He has also been engaged in weekly psychotherapy for an extended period of time.


Since the time of my first meeting with Mr. Caramadre, on 10/13/11, his profound, intrusive, relentless and ruminative worries have focused almost exclusively upon his current legal matter. The content of his obsessions have focused primarily on the need to declare his innocence to the world at large.

AFFIDAVIT

Due to the fixation and intensity of his need to declare his innocence, I have felt compelled, during our work together, to informally evaluate his ability to effectively assist counsel in his defense. Specifically, my medical concern was that Mr. Caramadre's Obsessive Compulsive Disorder, manifested as his intense need to declare his innocence, may have been suffocating his ability to effectively weigh the risks and benefits of all possible legal strategies. His vocalizations were intense and consistent over the course of the twenty-one of our sessions together: He would plead innocent (In order to declare his innocence). On 11/30/12 and 12/08/12, I received urgent calls from Mr. Caramadre (the only two calls registered as urgent since the inception of our work together). He vocalized that he had changed his plea, in the context of his wife's psychological frailty and that he was struggling with his decision. Shortly thereafter, Mr. Caramadre stated that his wife had stabilized and that he would seek withdrawal of his guilty plea.

I hereby swear that the above is true and correct to the best of my knowledge and belief under the penalty of perjury.

*Respectfully,*



Sarah L. Xavier, D.O

**Caron Zlotnick, Ph.D.**

Professor

Department of Psychiatry & Human Behavior

Brown Medical School

345 Blackstone Boulevard

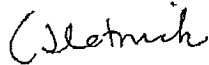
Providence RI 02806

Dear Honorable William E. Smith,

I have seen Mr. Joseph Caramadre for psychotherapy since 12/01/09. I have been treating him for major depression that has been chronic and associated with comorbid anxiety. His depression at times has been severe. Given his history of mental illness, a long period of incarceration could result in a severe episode of depression with serious impairment.

During my treatment of Mr. Caramadre for approximately three and half years, he was consistently very respectful and considerate towards me. He was unwavering in his strong commitment to his family and religious beliefs. He was compassionate towards others and I found no reason to question his integrity.

Sincerely,

A handwritten signature in cursive script, appearing to read 'C. Zlotnick'.

Caron Zlotnick, Ph.D.